

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE	)	
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 1:23-cv-09518-PAE-BCM
v.	)	
	)	
SOLARWINDS CORP. and TIMOTHY G.	)	<b><u>NOTICE OF MOTION</u></b>
BROWN,	)	
	)	<b>ORAL ARGUMENT REQUESTED</b>
	)	
Defendants.	)	
	)	

PLEASE TAKE NOTICE that upon the annexed Declaration of Serrin Turner and the exhibits attached thereto, and the accompanying Memorandum of Law, both dated March 22, 2024, the undersigned hereby moves this Court on behalf of Defendants SolarWinds Corp. and Timothy G. Brown before the Honorable Paul A. Engelmayer, in Courtroom 1305 of the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York, 10007, for an order granting Defendants' Motion to Dismiss the Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6), and for such other relief as the Court deems just and proper.

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Serrin Turner

Serrin Turner

Nicolas Luongo

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